



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

AUG 1 2005

Mr. Joe Calonge
Chief Engineer
Heil Trailer International
1125 Congress Parkway, N.E.
P.O. Box 160
Athens, TN 37371-0160

Ref. No.: 05-0122

Dear Mr. Calonge:

This is in response to your May 10, 2005 letter requesting clarification of the requirements for accident damage protection for DOT 406 cargo tank motor vehicles under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Specifically you ask if you may construct recesses within the shell of the cargo tank for service equipment (such as valves, fittings, and manholes).

The answer is yes. In your letter and attached drawings you describe and depict recesses at the top of the cargo tank, which prevent the service equipment from protruding beyond the shell of the tank. Components within the described recesses are not subject to accident damage protection (see § 178.345-8). However, the recesses are part of the cargo tank and must be constructed in accordance with all applicable requirements in Part 178, Subpart J.

I hope this information is helpful. If you have further questions, please do not hesitate to contact this office.

Sincerely,

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards



050122

178.345-8



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A  COMPANY

Pollack
\$178,345-8
Accident Damage Protection
05-0122

Ms. Susan Gorsky
Regulations Officer
US Department of Transportation
Pipelines & Hazardous
Materials Administration
Office of Hazardous Materials Standards
400 7th Street SW
Washington, DC. 20590

May 10th 2005

Re: Accident Damage Protection

Madam:

Our company Heil Trailer International manufactures and certifies DOT- 406 specification cargo tank motor vehicles.


We are considering providing accident damage protection to the devices usually located in the top of cargo tank see (49 CFR 178.345-8(a)(1) and (178.345-8(c)(1) &(2) by recessing the openings, opening closures, valves, fittings, pressure relief devices, vapor recovery stop valves and lading retaining fittings, in a well of sufficient depth that it lies below the arc formed by the upper shell of the cargo tank..

The structural integrity of such well will be as robust as the surrounding cargo tank shell.

The purpose of this letter is to request an interpretation of the damage protection concept outlined above.

Your input on this matter will be most appreciated

Truly Yours



Joe Calonge
Chief Engineer
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